



Michael J. Willemin

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May 1, 2025

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 1506
New York, NY 10007

Re: Eckhart v. Henry; Case No. 20-cv-5593 (RA) (GWG)

Dear Judge Abrams,

We represent Plaintiff in the above-referenced action and write on behalf of both parties in connection with Your Honor's Order regarding expert discovery, Dkt. No. 483. We apologize for any confusion. The reason that we did not raise any disputes with the Court or Judge Gorenstein is because there ultimately were no disputes. The parties agreed that expert discovery had not closed pursuant to Judge Gorenstein's prior Orders, and agreed upon a schedule for the disclosure of expert reports in advance of trial. The parties agreed that Plaintiff's expert report would be served on May 9, 2025, and that Defendant's rebuttal report would be served on Plaintiff on June 9, 2025. Accordingly, we respectfully request that expert discovery remain open through June 9, 2025, solely for the purpose of each party making the aforementioned expert disclosures.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. J. Willemin', is written over a horizontal line.

Michael J. Willemin